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JUN 5 2000

BY AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

JAMES P. ULWICK
KRAMON & GRAHAM
ONE SOUTH STREET, SUITE 2600
BALTIMORE, MARYLAND 21202
TELEPHONE (410) 752-6030
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Attorneys for Defendants KRONICK, MOSKOVITZ,
TIEDEMANN & GIRARD and WILLIAM A. KERSHAW

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

THOMAS H. KEELING,

CASE NO. JFM-CC-133

Plaintiff,
v.

**PETITION TO WITHDRAW AS
ATTORNEY OF RECORD**

KRONICK, MOSKOVITZ,
TIEDEMANN & GIRARD, A
PROFESSIONAL CORPORATION;
WILLIAM A. KERSHAW; and DOES 1
through 100, inclusive,

Defendants.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that HANSEN, BOYD, CULHANE & WATSON and JAMES J. BANKS seek leave of this court to withdraw as counsel of record to the Defendants KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD and WILLIAM A. KERSHAW. The appearance of other counsel of record for these defendants has been entered with this court. They are Mr. James P. Ulwick, Kramon & Graham, One South Street, Suite 2600, Baltimore, Maryland, 21202, telephone: (410) 752-6030. Also, Mr. Karl A. Keener, Baker, Keener & Nahra, 2850 Ocean Park Boulevard, Suite 300, Santa Monica, California, 90405, telephone: (310) 399-0900, has entered his appearance as counsel of record to the defendants. This petition is made in

607929. 1 Withdraw as Attorney of Record

1 accordance with the attached affidavit of James J. Banks.

2 **AFFIDAVIT OF JAMES J. BANKS**

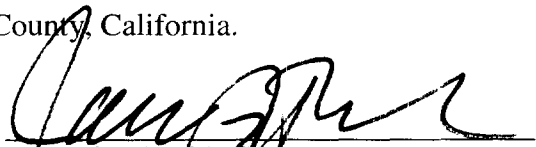
3 I, James J. Banks, declare:

4 1. I am an attorney admitted to the bar of the State of California. I am also admitted
5 pro hac vice to this court. I am a principal of Kronick, Moskovitz, Tiedemann & Girard, one of
6 the defendants herein. Formerly, I was a member of Hansen, Boyd, Culhane & Watson, one of
7 the counsel of record to the defendants.

8 2. While I was a member of Hansen, Boyd, Culhane & Watson, I was counsel of
9 record to Kronick, Moskovitz, Tiedemann & Girard and Mr. Kershaw in the captioned
10 litigation. Effective April 1, 2000, I left Hansen, Boyd, Culhane & Watson and joined Kronick,
11 Moskovitz, Tiedemann & Girard. Given the change in the circumstances of my professional
12 relationship with Kronick, Moskovitz, Tiedemann & Girard, it is appropriate that I withdraw as
13 its counsel of record in the litigation. Moreover, it is the desire of Kronick, Moskovitz,
14 Tiedemann & Girard and Mr. Kershaw that Hansen, Boyd, Culhane & Watson also withdraw as
15 its counsel of record. Messrs. Michael A. Grob of KMTG and Mr. Kershaw have executed on
16 behalf the firm, a notice of withdrawal to that effect. A true copy of that notice of withdrawal is
17 hereto attached as Exhibit A.

18 3. The defendants will suffer no prejudice from this notice of withdrawal. Messrs.
19 Karl A. Keener and Mr. James P. Ulwick have entered their appearance as the defendants'
20 counsel of record.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 ~~22~~ day of May, 2000, at Sacramento, Sacramento County, California.

23
24 
JAMES J. BANKS

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Attorneys for Defendants KRONICK, MOSKOVITZ,
TIEDEMANN & GIRARD and WILLIAM A. KERSHAW

UNITED STATES DISTRICT COURT
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THOMAS H. KEELING,

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v.

KRONICK, MOSKOVITZ,
TIEDEMANN & GIRARD, A
PROFESSIONAL CORPORATION;
WILLIAM A. KERSHAW; and DOES i
through 100, inclusive,

Defendants.

CASE NO. JFM-CC-133

**NOTICE OF WITHDRAWAL OF
ATTORNEY OF RECORD**

TO DEFENDANTS AND THEIR COUNSEL OF RECORD:

NOTICE IS HEREBY GIVEN that HANSEN, BOYD, CULHANE & WATSON have
withdrawn as attorney of record for Defendants KRONICK, MOSKOVITZ, TIEDEMANN &
GIRARD, in the above entitled action, effective April 3, 2000.

1 Dated: May __, 2000

2 HANSEN, BOYD, CULHANE & WATSON

3
4 By 

5 LAWRENCE R. WATSON
6 Attorneys for Defendants KRONICK,
7 MOSKOVITZ, TIEDEMANN & GIRARD

8 We consent to this withdrawal.

9 Dated: May 15, 2000

10 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

11
12 By 

13 MICHAEL A. GROB

14
15 Dated: May 21, 2000

16 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

17
18 By 

19 WILLIAM A. KERSHAW

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD

CASE NAME: Keeling v. KMTG, et al.

COURT: United States District Court, District of Maryland

Case No.: JFM-00-133

PROOF OF SERVICE BY MAIL

I am a citizen of the United States and employed in Sacramento County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 400 Capitol Mall, 27th Floor, Sacramento, CA 95814-4416. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On May 30, 2000 I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within documents:

PETITION TO WITHDRAW AS ATTORNEY OF RECORD

in a sealed envelope, postage fully paid, addressed as follows:

Edward Freidberg
FREIDBERG LAW CORPORATION
650 University Avenue
Suite 205
Sacramento, CA 95825

Andrew D. Freeman
BROWN, GOLDSTEIN & LEVY,
LLP
300 Maryland Bar Center
520 West Fayette Street
Baltimore, MD 21201

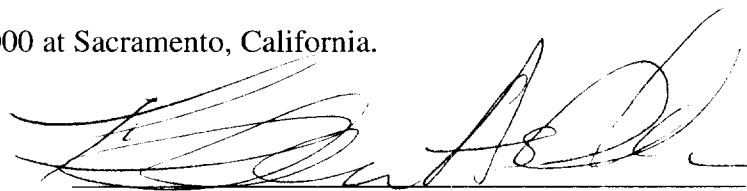
Karl A. Keener
BAKER, KEENER & NAHRA
2850 Ocean Park Boulevard
Suite 300
Santa Monica, CA 90405

James P. Ulwich
KRAMON & GRAHAM, P.A.
One South Street, Suite 2600
Baltimore, MD 21202

Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on May 30, 2000 at Sacramento, California.



TAMI ASCHENBRENNER